

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

SMART LOCAL 265 WELFARE FUND,)	
<i>et al.</i> ,)	
)	
Plaintiffs,)	CIVIL ACTION
)	
vs.)	NO. 24 C 632
)	
MAY-AIRE HEATING AND COOLING CO.,)	JUDGE SARA L. ELLIS
INC., an Illinois corporation,)	
)	
Defendant.)	

MOTION FOR ENTRY OF DEFAULT AND JUDGMENT

Plaintiffs, by their attorneys, and pursuant to Federal Rule of Civil Procedure Rule 55(b), move for entry of judgment by default against Defendant, MAY-AIRE HEATING AND COOLING CO., INC., an Illinois corporation, in the total amount of \$174,634.58, plus Plaintiffs' court costs and reasonable attorneys' fees in the amount of \$1,289.25.

On January 31, 2024, the Summons and Complaint was served on the Registered Agent by tendering a copy of said documents to her personally at her place of business (a copy of the Summons and Affidavit of Service is attached hereto). Therefore, Defendant's answer was due on February 21, 2024. As Defendant has failed to timely answer the Complaint, Plaintiffs respectfully request entry of default and judgment pursuant to F.R.Civ.P. Rule 55(b).

/s/ Catherine M. Chapman

Catherine M. Chapman
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CERTIFICATE OF SERVICE

The undersigned, an attorney of record, hereby certifies that she electronically filed the foregoing document (Motion for Entry of Default and Judgment) with the Clerk of Court using the CM/ECF system, and further certifies that I have mailed the above-referenced document by United States Mail to the following non-CM/ECF participant on or before the hour of 5:00 p.m. this 4th day of March 2024:

Ms. Gina M. Cicone, Registered Agent
May-Aire Heating and Cooling Co., Inc.
698 N. Larch Avenue
Elmhurst, IL 60126-1522

/s/ Catherine M. Chapman _____

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